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RECEIVED

OCT 28 2010

**Environmental
Cleanup Office**

VIA OVERNIGHT DELIVERY

October 27, 2010

Ms. Kristine Koch
Remedial Project Manager
United States Environmental Protection Agency, Region 10
Office of Environmental Cleanup, Mail Code ECL-115
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

Re: **Supplemental Response to First Request for Information to Phillips Oil Co.
(i.e., Phillips Petroleum Company)
Portland Harbor Superfund Site
Portland, Oregon**

Dear Ms. Koch:

This letter and the accompanying supplemental responses are being submitted by ConocoPhillips Company, on behalf of the former Phillips Petroleum Company (erroneously identified as Phillips Oil Company), to the EPA's First Request for Information letter, dated January 18, 2008, concerning the Portland Harbor Superfund Site (the "Site") in Portland, Oregon.

ConocoPhillips Company has provided information regarding employees consulted in preparation of the response and requests that any contact with these employees be made through Paul Hamada, Senior Counsel, ConocoPhillips Company, ML 2080, 600 North Dairy Ashford, Houston, TX 77079, Phone 281-293-1036.

The request from the EPA required that ConocoPhillips' response be accompanied by a declaration from a company representative. It is ConocoPhillips' position that neither Section 104 of CERCLA nor Section 3007 of RCRA contains requirements that the information and documentation submitted in response to this request include a declaration of the type you requested. ConocoPhillips has made a diligent search of its records and conducted an investigation of its involvement with this Site, and we are confident that the

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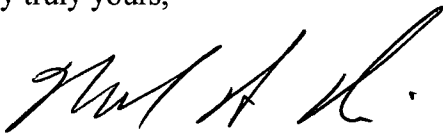
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responses contained herein are accurate to the extent that information is currently available.

ConocoPhillips will continue its efforts to locate additional information that may be responsive to this information request. Accordingly, nothing contained herein shall be interpreted or construed as an admission or waiver of any claims, rights or defenses of ConocoPhillips, and ConocoPhillips reserves any and all claims, rights and defenses relating to the matters addressed herein including the right to amend or supplement this response. Should such information or records be located or identified pursuant to these efforts, ConocoPhillips will provide supplements to this response.

Please direct any further communications regarding this matter to Willette A. DuBose, HS&E Legal Specialist, ConocoPhillips Company, ML 2070, Downstream Group, 600 North Dairy Ashford, Houston, TX 77079, Phone (281) 293-6952.

Very truly yours,



Mark A. Aebi
ConocoPhillips Company
Risk Management and Remediation
Manager, Legacy Issues

cc: Terry Lauck, Site Manager, RM&R, ConocoPhillips
Ann Anderson, Claims Consultant, RM&R, ConocoPhillips
Paul Hamada, Senior Counsel, Legal, ConocoPhillips
Willette A. DuBose, HS&E Legal Specialist, Legal, ConocoPhillips